

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

J.D. and R.D.

Plaintiffs

v.

BENJAMIN PRICE; DELTA AIR LINES,  
INC.; HOST INTERNATIONAL, INC., and  
HMSHOST CORPORATION

Defendants

CIVIL ACTION

CASE NO. 2:20-cv-749

**PLAINTIFFS' WITNESS LIST**

	<b>Witness</b>	<b>Will/May Call</b>	<b>Offer of Proof of Substance of Testimony</b>
<b>1</b>	Marion Alston, DNP Deuser and Associate 7 Saint Andrews Court Brunswick, GA, 31520 (912) 267-0774	May Call	Ms. Alston is a psychiatric mental health nurse and medical provider of J.D with knowledge of her mental health diagnoses as they relate to this assault and incident.
<b>2</b>	Renae Asay 333 East 1 <sup>st</sup> Avenue, Tarentum, PA 15084 c/o Kathryn A. Grace, Esq. Pete Schwenker, Esq. WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP Two Commerce Square 2001 Market Street, Suite 3100 Philadelphia, PA 19103 P: (215) 606-3927 F: (215) 627-2665 <a href="mailto:Kathryn.grace@wilsonelser.com">Kathryn.grace@wilsonelser.com</a> <a href="mailto:Pete.schwenker@wilsonelser.com">Pete.schwenker@wilsonelser.com</a>	May Call	Ms. Asay was a Delta Air Lines, Inc. employee with personal knowledge of Delta's procedures for handling intoxicated passengers and has personal knowledge of the subject flight, Delta Flight 1860 on May 20, 2018.
<b>3</b>	Dequavius Baker 3725 Princeton Lakes Pkway, Apt. 6312, Atlanta, GA 30331 c/o Kathryn A. Grace, Esq. Pete Schwenker, Esq. WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP Two Commerce Square	May Call	Mr. Baker was a Delta Air Lines, Inc. employee with personal knowledge of Delta's procedures for handling intoxicated passengers and has personal knowledge of the subject flight, Delta Flight 1860 on May 20, 2018.

	2001 Market Street, Suite 3100 Philadelphia, PA 19103 P: (215) 606-3927 F: (215) 627-2665 <a href="mailto:Kathryn.grace@wilsonelser.com">Kathryn.grace@wilsonelser.com</a> <a href="mailto:Pete.schwenker@wilsonelser.com">Pete.schwenker@wilsonelser.com</a>		
4	Jan Burton aka Jan Duplechain 7622 Bowhead Court, Fairburn, GA 30213 c/o Kathryn A. Grace, Esq. Pete Schwenker, Esq. WILSON ELSE MOSKOWITZ EDELMAN & DICKER, LLP Two Commerce Square 2001 Market Street, Suite 3100 Philadelphia, PA 19103 P: (215) 606-3927 F: (215) 627-2665 <a href="mailto:Kathryn.grace@wilsonelser.com">Kathryn.grace@wilsonelser.com</a> <a href="mailto:Pete.schwenker@wilsonelser.com">Pete.schwenker@wilsonelser.com</a>	Will Call	Ms. Burton was a Delta Air Lines, Inc. employee with personal knowledge of Delta's procedures for handling intoxicated passengers and has personal knowledge of the subject flight, Delta Flight 1860 on May 20, 2018.
5	Detective Nicholas Deaton 7911 N. McDonough Street Jonesboro, Georgia 30236 (678) 617-5072 <a href="mailto:Nicholas.deaton@claytoncountyga.gov">Nicholas.deaton@claytoncountyga.gov</a>	Will Call	Detective Deaton is expected to testify regarding his personal observation of the intoxication of Mr. Price on May 20, 2018 and his arrest of Mr. Price for public drunkenness in Clayton County, GA.
6	J.D. c/o Amanda C. Dure, Esq. PANGIA LAW GROUP 1717 N Street NW Suite 300 Washington, DC 20036 <a href="mailto:adure@pangialaw.com">adure@pangialaw.com</a> (202) 955-6153	Will Call	J.D. is a Plaintiff. She is expected to testify to Benjamin Price's prior to, during, and after Delta Flight 1860; the sexual assault aboard Delta Flight 1860 committed; and noneconomic damages suffered by her and loss of consortium damages suffered by her husband, R.D..
7	R.D. c/o Amanda C. Dure, Esq. PANGIA LAW GROUP 1717 N Street NW Suite 300 Washington, DC 20036 <a href="mailto:adure@pangialaw.com">adure@pangialaw.com</a> (202) 955-6153	Will Call	R.D. is a Plaintiff and the husband of J.D. He is expected to testify as to the noneconomic damages suffered by his wife, and loss of consortium damages suffered by him.

<b>8</b>	Bradford Frost 1490 Seminole Street, Mount Pleasant, SC, 29464 c/o Kathryn A. Grace, Esq. Pete Schwenker, Esq. WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP Two Commerce Square 2001 Market Street, Suite 3100 Philadelphia, PA 19103 P: (215) 606-3927 F: (215) 627-2665 <a href="mailto:Kathryn.grace@wilsonelser.com">Kathryn.grace@wilsonelser.com</a> <a href="mailto:Pete.schwenker@wilsonelser.com">Pete.schwenker@wilsonelser.com</a>	May Call	Mr. Frost was a Delta Air Lines, Inc. employee with personal knowledge of Delta's procedures for handling intoxicated passengers and has personal knowledge of the subject flight, Delta Flight 1860 on May 20, 2018.
<b>9</b>	Virginia Holm, LCSW Deuser and Associate 7 Saint Andrews Court Brunswick, GA, 31520 (912) 267-0774	Will Call	Ms. Holm is J.D.'s current therapist and is expected to testify to the psychological effect the sexual assault has had on J.D., including her diagnoses of post-traumatic stress disorder and major depression.
<b>10</b>	Spencer Hutchinson 6276 Hickory Lane Cir., Union City, GA, 30291 c/o Kathryn A. Grace, Esq. Pete Schwenker, Esq. WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP Two Commerce Square 2001 Market Street, Suite 3100 Philadelphia, PA 19103 P: (215) 606-3927 F: (215) 627-2665 <a href="mailto:Kathryn.grace@wilsonelser.com">Kathryn.grace@wilsonelser.com</a> <a href="mailto:Pete.schwenker@wilsonelser.com">Pete.schwenker@wilsonelser.com</a>	Will Call	Mr. Hutchinson was a Delta Air Lines, Inc. employee with personal knowledge of Delta's procedures for handling intoxicated passengers and has personal knowledge of the subject flight, Delta Flight 1860 on May 20, 2018.
<b>11</b>	Stephanie Johnson 135 Cropper Street Weirton, WV 26062 (304) 670-8909	Will Call	Ms. Johnson is a former employee of HMSHost Corporation's Pittsburgh International Airport TGIFridays and has personal knowledge of the operations of the restaurant.
<b>12</b>	Joseph Kryzanowski as HMSHostCorporation 30(b)(6) Witness c/o Maureen E. Daley, Esq. RAWLE & HENDERSON, LLP The Henry W. Oliver Building	Will Call	Mr. Kryzanowski is an HMSHost Corporation manager and has personal knowledge of the operations of the Pittsburgh International Airport TGIFridays.

	535 Smithfield Street Suite 1000 Pittsburgh, PA 15222 <a href="mailto:MDaley@rawle.com">MDaley@rawle.com</a>		
<b>13</b>	Dr. Roy Lubit c/o Amanda C. Dure, Esq. PANGIA LAW GROUP 1717 N Street NW Suite 300 Washington, DC 20036 <a href="mailto:adure@pangialaw.com">adure@pangialaw.com</a> (202) 955-6153	Will Call	Dr. Lubit is a forensic psychiatrist and is expected to testify to the psychological effects the sexual assault has had on J.D., including her diagnoses of post traumatic stress disorder and major depression.
<b>14</b>	Captain James McKenize III 1487A Woodmont Blvd, Nashville, TN 37215 c/o Kathryn A. Grace, Esq. Pete Schwenker, Esq. WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP Two Commerce Square 2001 Market Street, Suite 3100 Philadelphia, PA 19103 P: (215) 606-3927 F: (215) 627-2665 <a href="mailto:Kathryn.grace@wilsonelser.com">Kathryn.grace@wilsonelser.com</a> <a href="mailto:Pete.schwenker@wilsonelser.com">Pete.schwenker@wilsonelser.com</a>	May Call	Capt. MacKenzie was a Delta Air Lines, Inc. employee with personal knowledge of Delta's procedures for handling intoxicated passengers and has personal knowledge of the subject flight, Delta Flight 1860 on May 20, 2018.
<b>15</b>	Vincent Pilloli 6657 Bristlewood Drive Youngstown, Ohio 44512 (330) 550-2231	Will Call	Mr. Pilloli is a witness to the assault on J.D. by Benjamin Price.
<b>16</b>	Benjamin Price c/o Sunshine Fellows, Esq. LEWIS, BRISBOIS, BISGAARD & SMITH, LLP One PPG Place 28 <sup>th</sup> Floor Pittsburgh, PA 15222 P: (412) 250-7304 <a href="mailto:Sunshine.R.Fellows@lewisbrisbois.com">Sunshine.R.Fellows@lewisbrisbois.com</a>	Will Call	Mr. Price is a defendant in this matter. Mr. Price is expected to testify to his intoxication and consumption of alcoholic beverages on May 20, 2018
<b>17</b>	Dr. Harvey Rosen c/o Amanda C. Dure, Esq. PANGIA LAW GROUP 1717 N Street NW	Will Call	Dr. Rosen is an economist and is expected to testify to the amount of loss of household services suffered

	Suite 300 Washington, DC 20036 <a href="mailto:adure@pangialaw.com">adure@pangialaw.com</a> (202) 955-6153		by R.D. as a result of the sexual assault suffered by J.D.
<b>18</b>	David Rutecki c/o Amanda C. Dure, Esq. PANGIA LAW GROUP 1717 N Street NW Suite 300 Washington, DC 20036 <a href="mailto:adure@pangialaw.com">adure@pangialaw.com</a> (202) 955-6153	May Call	Mr. Rutecki is a hospitality expert designated by the Plaintiffs and is expected to testify in accordance with his disclosed report.
<b>19</b>	Suzan Shaw 2040 Saint George Avenue, Winter Park, FL 32789 c/o Kathryn A. Grace, Esq. Pete Schwenker, Esq. WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP Two Commerce Square 2001 Market Street, Suite 3100 Philadelphia, PA 19103 P: (215) 606-3927 F: (215) 627-2665 <a href="mailto:Kathryn.grace@wilsonelser.com">Kathryn.grace@wilsonelser.com</a> <a href="mailto:Pete.schwenker@wilsonelser.com">Pete.schwenker@wilsonelser.com</a>	Will Call	Ms. Shaw was a Delta Air Lines, Inc. employee with personal knowledge of Delta's procedures for handling intoxicated passengers and has personal knowledge of the subject flight, Delta Flight 1860 on May 20, 2018.
<b>20</b>	Juavesha Stephens 318 Lara Lane, McDonough, GA 30253 c/o Kathryn A. Grace, Esq. Pete Schwenker, Esq. WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP Two Commerce Square 2001 Market Street, Suite 3100 Philadelphia, PA 19103 P: (215) 606-3927 F: (215) 627-2665 <a href="mailto:Kathryn.grace@wilsonelser.com">Kathryn.grace@wilsonelser.com</a> <a href="mailto:Pete.schwenker@wilsonelser.com">Pete.schwenker@wilsonelser.com</a>	May Call	Ms. Stephens was a Delta Air Lines, Inc. employee with personal knowledge of Delta's procedures for handling intoxicated passengers and has personal knowledge of the subject flight, Delta Flight 1860 on May 20, 2018.
<b>21</b>	Dr. Randall Tackett c/o Amanda C. Dure, Esq. PANGIA LAW GROUP	Will Call	Dr. Tackett is toxicologist and pharmacologist and is expected to testify what visible symptoms of

	1717 N Street NW Suite 300 Washington, DC 20036 <a href="mailto:adure@pangialaw.com">adure@pangialaw.com</a> (202) 955-6153		intoxication are produced by alcohol; what symptoms Benjamin Price was more likely than not exhibiting at the time he was at the Pittsburgh Airport TGIFridays
<b>22</b>	Plaintiffs reserve the right to call its witnesses of any individuals identified in the Initial Disclosures, interrogatories, and/or requests for production of documents of any other party not explicitly named in this document, and/or throughout the discovery process of any other party.		

Respectfully submitted this the 8<sup>th</sup> day of July, 2022.

PANGIA LAW GROUP

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Attorneys for Plaintiff J.D. and R.D.

### **CERTIFICATE OF SERVICE**

I certify that on this the 8<sup>th</sup> day of July, 2022, that a true and correct copy of the foregoing PLAINTIFFS' WITNESS LIST was served upon the counsel of record via ECF filing:

<p>Todd A. Gray, Esq. Sunshine Fellows, Esq. Donald Smith, Esq. Chloe Zidian, Esq. LEWIS, BRISBOIS, BISGAARD &amp; SMITH, LLP One PPG Place 28<sup>th</sup> Floor Pittsburgh, PA 15222 P: (412) 250-7304 F: (412) 567-5494 <a href="mailto:Todd.gray@lewisbrisbois.com">Todd.gray@lewisbrisbois.com</a> <a href="mailto:Sunshine.R.Fellows@lewisbrisbois.com">Sunshine.R.Fellows@lewisbrisbois.com</a> <a href="mailto:Donald.Smith@lewisbrisbois.com">Donald.Smith@lewisbrisbois.com</a> <a href="mailto:Chloe.zidian@lewisbrisbois.com">Chloe.zidian@lewisbrisbois.com</a> <i>Counsel for Defendant Benjamin Price</i></p>	<p>Kathryn A. Grace, Esq. Pete Schwenker, Esq. WILSON ELSEER MOSKOWITZ EDELMAN &amp; DICKER, LLP Two Commerce Square 2001 Market Street, Suite 3100 Philadelphia, PA 19103 P: (215) 606-3927 F: (215) 627-2665 <a href="mailto:Kathryn.grace@wilsonelser.com">Kathryn.grace@wilsonelser.com</a> <a href="mailto:Pete.schwenker@wilsonelser.com">Pete.schwenker@wilsonelser.com</a> <i>Counsel for Defendant Delta Air Lines, Inc.</i></p>
<p>Thomas DiStefano, Esq. Maureen E. Daley, Esq. RAWLE &amp; HENDERSON, LLP The Henry W. Oliver Building 535 Smithfield Street Suite 1000 Pittsburgh, PA 15222 <a href="mailto:tdistefano@rawle.com">tdistefano@rawle.com</a> <a href="mailto:MDaley@rawle.com">MDaley@rawle.com</a> <i>Counsel for Defendant Host International, Inc., HMSHost Corporation</i></p>	

/s/ Amanda C. Dure